

Monsanto

PERSONAL & CONFIDENTIALFROM M. E. Whelan - WCK
(NAME-LOCATION-PHONE)DATE: March 2, 1983
SUBJECT: Chlorophenol Decontaminationcc: D. Edwards - B2SE
B. Fay
D. Lynch

REFERENCE

TO: F. Matthews
E. Stewart

As a part of the decontamination of the Chlorophenol equipment, we will be developing wash procedures to remove the residual material. The question at hand is how clean is clean or must clean be? I propose that the final rinse water be analyzed for total chlorophenol content and the equipment be declared clean if the rinse water has less than 50 PPM chlorophenols. This is the same level used for PCB's for legal contamination determination. This level will also insure any trace impurities are well below current detection method limits. Our current wash practices should be sufficient to meet this criterion. We will be running some plant tests to verify that this level is achievable. We do plan to use caustic, if necessary, to effectively clean the equipment.

The current plans called for a controlled scrap of all equipment unless an approved alternate use is identified. Railcars will either be scrapped, returned to the lease company or placed in alternate service. We do not anticipate restricting use of this equipment from anything but food grade service.

This wash level is a key to our cleaning plan and will be the level we establish unless otherwise directed.

M. E. Whelan
M. E. Whelan

/bb

MCO 8769920

Monsanto

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FROM: NAME-LOCATION-PHONE: D. J. Kalota - Q2E

TO:	November 23, 1982	cc:	D. K. Lynch	- 1740
			J. W. Mottern	- Q2E
SUBJECT:	EPA's FINAL RULE ON PCB's IN 'CLOSED AND CONTROLLED WASTE MANUFACTURING PROCESSES'		J. C. Peduzzi	- 1740
REFERENCE:			W. R. Richard	- R4B
FO:	Federal Register, Vol 47 (No. 204), October 21, 1982			

D. H. Bolliger - R4B

The final EPA rule regulating PCB's in closed and controlled waste manufacturing processes has, 1) set limit of quantitation (LOQ) for PCB's in product or waste at 2 ppm/GC peak, 2) increased the number of acceptable waste disposal mechanisms, 3) instituted new record-keeping and reporting requirements.

Processes that qualify as closed or controlled waste facilities are excluded from the TSCA section 6(e) ban. By my interpretation, the chlorobenzene process at WGK does qualify for the exclusion with respect to products and wastes from stills. We now know that all distilled products and PDCB from these processes contain less than the EPA established cutoff of 2 ppm/peak. Also, the waste residues that contain >50 ppm PCB's are handled in accordance with the existing PCB disposal and marking rule (43FR7150). The HCl carbon is still being evaluated. Analysis of carbon samples indicates that they do contain PCB's. The EPA rule permits disposal in a qualified incinerator or in an EPA approved PCB landfill waste containing PCB's between the LOQ and 50 ppm.

To qualify for the exclusion, the following recordkeeping and reporting requirements must be met:

1. Certify that the process qualifies.
2. Notify the EPA of the certification and how they made the determination.
3. Maintain a record of the determination that the process qualifies for exclusion.

The EPA's preferred analytical method is the capillary gas chromatography/electron impact mass spectrometer (CGC/EIMS). The GC/MS method that was used in our recent study of the process was equivalent to the EPA method but used a packed column instead of a capillary column.

MCO 8769921

D. J. Kalota
D. J. Kalota

is Re your memo to FBM + EES
2/2/83 - note the lower PCB limit.
OK Lynch

REV. 4/77

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MONSANTO

PERSONAL & CONFIDENTIAL

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TO: M. E. Whelan - WGK

DATE: February 25, 1983

F. Matthews
B. Fay

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FROM: Waste Disposal from Chlorophenol
and Santophen Decommissioning and
Dismantling

TO: Dick Sinise
Andy Quick

In the shutdown of our Chlorophenol and Santophen operations, we will generate several waste streams that will require proper disposal. I would like your input relative to the following plan for disposition of these waste streams.

Santophen Decommissioning

These streams will be small quantities of the existing Santophen streams including intermediates. They might also include some isopropyl alcohol from residual solution storage tanks. This is the only compound that would not be present in our current Santophen residue. We propose treating all these streams as Santophen residue and incinerating under our existing Rollins contract. Quantity is estimated at less than one tank trailer.

Chlorophenol Decommissioning

The majority of the Chlorophenol residual material we should be able to mix and sell as OCP Crude Fractions to our existing customers. Any further residual material we will blend with the Santophen extracted residue from the acidifier and incinerate under our existing Rollins contract.

Chlorophenol Still Residue

The still residue including a fuel oil flush of both the still pot and storage tank will be incinerated under the soon to be finalized contract with Rollins Deerpark. We will use the same terms and transportation arrangements planned for the current residue.

MCO 8769848

Dick Sinise, Andy Quick
Waste Disposal from Chlorophenol
and Santophen Decommissioning and Dismantling

Page 2
WGK
2/25/83

Santophen Decontamination

Our current plans call for hot caustic wash followed by cold rinses for all the process equipment. Washings will continue until we reach some yet to be defined chlorophenol level in the wash water. The washes will be sewered per current practice. During this period, we will be monitoring sewer discharges daily for chlorophenols to avoid permit excursions at the waste treatment plant.

Chlorophenol Decontamination

Our plans again call for hot caustic washes followed by cold rinses until our residual chlorophenol level in the wash drops below our target. Wash water will be treated in the acidifier to remove phenolics unless the water analysis shows the phenolic level below the normal acidifier water discharge level. In this case, the water will be directly sewered. Daily sewer phenolic monitoring should avoid permit excursions at the waste treatment plant. Water used to wash the still pot and residue still will be treated regardless of phenolic level.

In addition, we will need disposal locations for the tank and pipe insulation and for the contaminated dirt and concrete that we remove. We will be getting core samples in March to better quantify the amount of dirt excavation needed.

These are the needs as we see them at this time. What are your thoughts on the subject?

Mike
M. E. Whelan

/bb

MCO 8769849

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

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DEPT. 237 WASHOUT TRANSFER SHEET

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

EPA/CEPRO COPPER/EIL/PCB ATTORNEY WORK PRODUCT / ATTORNEY CLIENT PRIVILEGE

PROTECTED MATERIAL: MONSANTO INSURANCE COVERAGE LITIGATION

DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8769947

PROTECTED MATERIAL: MONSANTO INSURANCE COVERAGE LITIGATION

DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8769952

DEPT. 237 WASHOUT TRANSFER SHEET

#220
PUMP
Had to
be replaced

HCO 8769955

DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

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DEPT. 237 WASHOUT TRANSFER SHEET

[illegible]

MCO 8769959

DEPT. 237 WASHOUT TRANSFER SHEET

[illegible]

MCO 8769961

DEPT. 237 WASHOUT TRANSFER SHEET

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

EPA/CERRO COPPER/EIL/PCB ATTORNEY WORK PRODUCT / ATTORNEY CLIENT PRIVILEGE

DEPT. 237 WASHOUT TRANSFER SHEET

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

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PROTECTED MATERIAL: MONSANTO INSURANCE COVERAGE LITIGATION

DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

HCO 8769975

#36

[illegible]

MCO 8769979

DEPT. 237 WASHOUT TRANSFER SHEET

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From Tank No.	To Tank No.	Phenol Content	Date	Time	Operator
Residue	164 409	---	9-20-83	7:55 AM	2059
164 =	409	71000	9-20-83	10:10	2059
	CHLOR				
CHLOR	164	---	9/22		418
164	405	600	9/23		418
Residue	105	1			
105	165	9	9/26	5:00 P	418
Residue	102	1			
102	114	19	9/27	8:40 A	418

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

WCO 8769985

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DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8769991

DEPT. 237 WASHOUT TRANSFER SHEET

#23

[illegible]

MCO 8769992

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DEPT. 237 WASHOUT TRANSFER SHEET

[illegible]

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8769993

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DEPT. 237 WASHOUT TRANSFER SHEET

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EPA/CERRO COPPER/EIL/PCB ATTORNEY WORK PRODUCT / ATTORNEY CLIENT PRIVILEGE

DEPT. 237 WASHOUT TRANSFER SHEET

Wash #17

RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8769998

Scupper #4

DEPT. 237 WASHOUT TRANSFER SHEET

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RECORD ALL TRANSFERS OF WASH WATER AND PHENOL CONTENT OF WASH PRIOR TO PUMPING.

MCO 8770011

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Sample #3

[illegible]

MCQ 8770012

